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MAXLINEAR, INC. and MAXLINEAR  
9 COMMUNICATIONS LLC

10 UNITED STATES DISTRICT COURT  
11 CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION

12 ENTROPIC COMMUNICATIONS,  
13 LLC,

14 Plaintiff,

15 v.

16 DISH NETWORK CORPORATION,  
17 et al.,

18 Defendants.

19 DISH NETWORK CORPORATION;  
20 DISH NETWORK L.L.C.; DISH  
21 NETWORK SERVICE L.L.C.; DISH  
22 NETWORK CALIFORNIA  
SERVICE CORPORATION; AND  
DISH TECHNOLOGIES, L.L.C.,

23 Counter-Claimants,

24 v.

25 ENTROPIC COMMUNICATIONS,  
26 LLC; MAXLINEAR, INC.; AND  
MAXLINEAR COMMUNICATIONS  
LLC,

27 Counter-Defendants.

Case No. 2:23-cv-1043-JWH-KES (Lead Case)

**COUNTER-DEFENDANTS  
MAXLINEAR, INC. AND  
MAXLINEAR COMMUNICATIONS  
LLC'S APPLICATION FOR LEAVE  
TO FILE UNDER SEAL MOTION TO  
DISMISS (1) AMENDED  
COUNTERCLAIMS BY DISH  
NETWORK CALIFORNIA SERVICE  
CORPORATION; AND (2)  
COUNTERCLAIMS BY DISH  
NETWORK CORPORATION, DISH  
NETWORK L.L.C., DISH NETWORK  
SERVICE L.L.C., AND DISH  
TECHNOLOGIES, L.L.C.**

**JURY TRIAL DEMANDED**

Action Filed: Feb. 10, 2023  
Am. Counterclaims and Counterclaims  
Filed: Jan. 31, 2024

**Hearing:**

Date: March 29, 2024  
Time: 9:00 a.m.  
Place: Courtroom 9D, Santa Ana  
Judge: Hon. John W. Holcomb

1 Pursuant to Local Rule 79-5.2.2(b) governing documents designated by  
 2 another as confidential pursuant to a protective order, Counter-Defendants  
 3 MaxLinear, Inc. and MaxLinear Communications LLC (collectively, "MaxLinear")  
 4 hereby submit their Application for Leave to File Under Seal Motion to Dismiss  
 5 (1) Amended Counterclaims by Dish Network California Service Corporation  
 6 ("Dish California") and (2) Counterclaims by Dish Network Corporation, Dish  
 7 Network L.L.C., Dish Network Service L.L.C., and Dish Technologies, L.L.C.  
 8 (collectively with Dish California, "Dish").

9 MaxLinear seeks leave to file under seal highlighted portions of MaxLinear's  
 10 Motion to Dismiss that quote from or reference documents previously filed under  
 11 seal by Dish in this action.

12 MaxLinear also seeks leave to file under seal highlighted portions of  
 13 MaxLinear's Motion to Dismiss that quote from or reference Exhibits B, C, or D to  
 14 the concurrently filed MaxLinear's Request for Judicial Notice in Support of Notice  
 15 of Motion and Motion to Dismiss (1) Amended Counterclaims by Dish Network  
 16 California Service Corporation and (2) Counterclaims by Dish Network  
 17 Corporation, Dish Network L.L.C., Dish Network Service L.L.C., and Dish  
 18 Technologies, L.L.C., as identified below:

Document to be sealed	Portions to be sealed (page:line(s))
Portions of MaxLinear's Motion to Dismiss that quote from or reference Exhibits B, C, and D to the concurrently filed MaxLinear's Request for Judicial Notice in Support of Notice of Motion and Motion to Dismiss (1) Amended Counterclaims by Dish Network California Service	10:1-2; 12:1-2; 12:13-14; 15:15-26; 16:1-2; 16:15-19; 19:28; 21:7-9

Document to be sealed	Portions to be sealed (page:line(s))
Corporation and (2) Counterclaims by Dish Network Corporation, Dish Network L.L.C., Dish Network Service L.L.C., and Dish Technologies, L.L.C.	
Portions of MaxLinear's Motion to Dismiss that quote from or reference documents previously filed under seal by Dish in this action.	10:6-8; 11:4; 12:25; 18:4-5; 21:27-28; 22:1-6; 22:9-10; 22:12-13; 22:25-26; 25:10-11; 30:9

Dish designated the documents in Exhibits B, C, and D as “Highly Confidential – Attorneys’ Eyes Only” under the operative protective order (ECF No. 156). (Declaration of Rose S. Lee in Support of MaxLinear’s Application for Leave to File under Seal, ¶¶ 3-5.) Dish confirmed the document should be filed under seal. (*Id.* ¶ 6.)

MaxLinear has no position on whether the material should be maintained under seal.

This Application is accompanied by a Declaration of Rose S. Lee and a Proposed Order.

1 Dated: February 21, 2024

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3 MORRISON & FOERSTER LLP

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5 By: /s/ Rose S. Lee  
6 Rose S. Lee

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